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10 **COMPASSION INTERNATIONAL, INC.**

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18 **IN THE UNITED STATES DISTRICT COURT**
19 **CENTRAL DISTRICT OF CALIFORNIA**

20 CIEARA MUNOZ, individually and on
21 behalf of all others similarly situated,

22 Plaintiff,

23 v.

24 COMPASSION INTERNATIONAL,
25 INC. an Illinois entity d/b/a
26 WWW.COMPASSION.COM,

27 Defendant.

Case No.: 2:23-cv-05439

[Los Angeles Superior Court Case No.
23STCV12470]

**DEFENDANT'S NOTICE OF
REMOVAL**

Action Filed: 06/02/2023
Action Removed: 07/07/2023

NOTICE OF REMOVAL

19 Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Compassion
20 International, Inc. ("Compassion"), by and through its undersigned counsel, hereby
21 provides notice of removal of the action from the Superior Court of California,
22 County of Los Angeles, to the United States District for the Central District of
23 California, Western Division. In support of this Notice of Removal, Compassion
24 states as follows:

25 **I. Plaintiff's Complaint**

26 1. On June 2, 2023, Plaintiff Cieara Munoz ("Plaintiff") filed a putative
27 class action complaint against Compassion in the Superior Court of California,
28 County of Los Angeles, captioned *Cieara Munoz, individually and on behalf of all*

1 *others similarly situated, v. Compassion International, Inc. an Illinois entity d/a/b*
2 *www.Compassion.com*, Case No. 23STCV12470 (the “State Court Action”).

3 2. On June 7, 2023, Compassion was served with a copy of the Complaint
4 and Summons in the State Court Action.

5 3. This Notice of Removal is timely filed under 28 U.S.C. § 1446(b)(1)
6 because it is filed within 30 days of the date Compassion was served with the initial
7 pleading.

8 4. Pursuant to 28 U.S.C. § 1446(a), all process, pleadings, and orders that
9 have been filed and served in the State Court Action are attached hereto as **Exhibit**
10 **A.**

11 5. Plaintiff alleges that Compassion violated the Video Privacy Protection
12 Act, 18 U.S.C. § 2710, *et seq.* (“VPPA”) through Compassion’s alleged sharing of
13 consumers’ personally identifiable information (“PII”) and video viewing
14 information with third party, Google, without Plaintiff’s informed written consent.
15 (Ex. 1, (“Compl.”) ¶¶ 17-21, 28-33.)

16 6. Plaintiff seeks to represent a putative class defined as “all persons in the
17 United States who played video content on The Website and whose PII was disclosed
18 by Defendant to any third party during the two years preceding the filing of this action
19 (the “Class Period”).” (Compl. ¶ 22.)

20 7. Plaintiff seeks class certification, statutory damages, punitive damages,
21 attorneys’ fees, and any and all other relief, at law or equity, that may be appropriate.
22 (Compl. p. 9, Prayer for Relief.)

23 **II. Federal Question Jurisdiction Pursuant to 28 U.S.C. § 1331**

24 8. This Court has jurisdiction over Plaintiff’s claim under 28 U.S.C.
25 § 1331.

26 9. A district court has federal question jurisdiction over a claim, and
27 removal is therefore proper, when the claim arises “under the Constitution, laws, or
28 treaties of the United States.” 28 U.S.C. § 1331; 28 U.S.C. § 1441(a).

10. Plaintiff brings one claim against Compassion for alleged violation of the federal VPPA.

III. Venue

13. Compassion will provide written notice of this Notice of Removal to Plaintiff and the Superior Court of California, Los Angeles County.

14. Compassion hereby reserves all of its defenses and rights, and none of the foregoing shall be construed as in any way conceding the truth of any of Plaintiff's allegations or waiving any of Compassion's defenses.

Respectfully submitted,

BAKER & HOSTETLER LLP

Attorneys for Defendant
COMPASSION INTERNATIONAL, INC.

PROOF OF SERVICE

I, Nancy L. Brazil, declare:

I am employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 11601 Wilshire Boulevard, Suite 1400, Los Angeles, CA 90025-0509. On July 7, 2023, I served a copy of the within document(s):

DEFENDANT'S NOTICE OF REMOVAL

by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below.



by transmitting via electronic mail the document(s) listed above to the e-mail address(es) set forth below on this date and the transmission was reported as complete and without error.

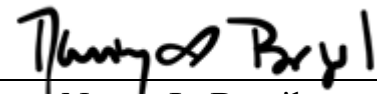
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Attorneys for Plaintiff
 CIEARA MUNOZ

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on July 7, 2023, at Los Angeles, California.


 Nancy L. Brazil